# MCNAIR LAW FIRM, P.A. ATTORNEYS AND COUNSELORS AT LAW

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December 31, 2004

### **VIA HAND DELIVERY**

Mr. Charles L. A. Terreni Chief Clerk and Administrator South Carolina Public Service Commission Synergy Business Park 101 Executive Center Drive Columbia, South Carolina 29210

> Application of Time Warner Telecom of South Carolina, LLC Re: to amend its Certificate of Public Convenience and Necessity to **Provide Local Exchange Telecommunications Services In** Additional Areas of the State of South Carolina Docket No. 2004-311-C

Dear Mr. Terreni:

Enclosed for filing on behalf of the South Carolina Telephone Coalition, please find an original and ten (10) copies of a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service, the party of record is being served with a copy of the Petition.

Please have one copy of this filing clocked in and returned with our courier.

Thank you for your assistance.

Very truly yours,

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MMF:rwm **Enclosures** 

cc: Bonnie D. Shealy, Esquire

172411 DAGC 30314-05

# BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

MTERVENOR 4 1.Db

Docket No. 2004-311-C

IN RE:	Application of Time Warner Telecom of South Carolina, LLC to amend its Certificate of Public Convenience and Necessity to Provide Local Exchange Telecommunications Services In Additional Areas of the State of South Carolina	PETITION TO INTERVENE	
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The South Carolina Telephone Coalition ("SCTC") respectfully submits the within Petition to Intervene in the above-referenced docket. In support of its Petition, SCTC would respectfully show unto this honorable Commission:

- 1. SCTC is a coalition of incumbent local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission. A list of companies on whose behalf the SCTC is intervening in this matter is attached hereto as "Exhibit A."
- 2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record in so far as its interests might appear.
- 3. SCTC has not yet developed a position with respect to this proceeding. However, as local exchange carriers serving customers in South Carolina, including customers in those areas of South Carolina for which Time Warner Telecom of South Carolina, LLC seeks certification, SCTC's members have an interest in this proceeding.

SETVICE: MC DW SETVICE:

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.

Margaret M. Fox

McNair Law Firm, P.A.

Post Office Box 11390

Columbia, South Carolina 29211

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pfox@mcnair.net

ATTORNEYS FOR THE SOUTH CAROLINA TELEPHONE COALITION

Columbia, South Carolina December 30, 2004

#### **EXHIBIT A**

# South Carolina Telephone Coalition Member Companies

Bluffton Telephone Company, Inc.

Chesnee Telephone Company

Chester Telephone Company

Farmers Telephone Cooperative, Inc.

Ft. Mill Telephone Company, d/b/a Comporium Communications, Inc.

Hargray Telephone Company, Inc.

Home Telephone Company, Inc.

Horry Telephone Cooperative, Inc.

Lancaster Telephone Company, d/b/a Comporium Communications, Inc.

Lockhart Telephone Company

McClellanville Telephone Company

Norway Telephone Company

Palmetto Rural Telephone Cooperative, Inc.

Piedmont Rural Telephone Cooperative, Inc.

PBT Telecom, Inc.

Ridgeway Telephone Company

Rock Hill Telephone Company, d/b/a Comporium Communications, Inc.

Sandhill Telephone Cooperative, Inc.

St. Stephen Telephone Company

West Carolina Rural Telephone Cooperative, Inc.

Williston Telephone Company

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Docket No. 2004-311-C

IN RE:	Application of Time Warner Telecom of South Carolina, LLC to amend its Certificate of Public Convenience and Necessity to Provide Local Exchange Telecommunications Services In Additional Areas of the State of South Carolina	) ) ) ) ) )	CERTIFICATE OF SERVICE
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This is to certify that I, Rebecca W. Martin, an employee with the McNair Law Firm, P. A., have this date served one (1) copy of a Petition to Intervene on behalf of the South Carolina Telephone Coalition in the above-referenced matter to the person named below by causing said copy to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below.

Bonnie D. Shealy, Esquire Robinson McFadden Post Office Box 944 Columbia, South Carolina 29202

Resecca W. Martin

McNair Law Firm, P.A. Post Office Box 11390

Columbia, South Carolina 29211

(803) 799-9800

December 31, 2004

Columbia, SC